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**Not for service*

July 8, 2025

VIA ECF

Hon. LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Korey Watson v. The City of New York et al., 23-CV-08975 (LDH)(TAM)

Your Honor:

I am co-counsel for Plaintiff Korey Watson in the above-referenced matter.

I write to ask that the Court extend Plaintiff's time to respond to the pre-motion conference letter at ECF 41 filed by counsel for Defendants City of New York, Sabrina Duncan, and Ken Probherbs (collectively, the "City Defendants") from July 11, 2025 until July 28, 2025. There has been no prior request for this relief. All Defendants consent to this application.

Since counsel for the City Defendants revealed the existence of the release attached to the City Defendants' pre-motion conference letter, Plaintiff's counsel have been investigating the circumstances surrounding its existence and researching its potential implications. We are unfortunately still in the process of conducting that investigation, including communicating with the attorney who represented Mr. Watson in the other case.

Thank you for the Court's attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver